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Attorneys for MOAC Mall Holdings LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re : Chapter 11
:
SEARS HOLDING CORPORATION, *et al.*,¹ : Case No. 18-23538 (RDD)
:
Debtors. : (Jointly Administered)
----- X

NOTICE OF SPECIAL APPEARANCE

PLEASE TAKE NOTICE that Gregg M. Galardi, Douglas Hallward-Driemeier, and Andrew G. Devore hereby appear on behalf of MOAC Mall Holdings LLC (“MOAC”) and hereby request that copies of all notices and pleadings given or filed in the above-captioned cases be given

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

and served upon the undersigned.

PLEASE TAKE FURTHER NOTICE that this Notice of Special Appearance shall not constitute a submission by MOAC to the jurisdiction of the Bankruptcy Court, and that MOAC specifically appears only for purposes of objecting to the *Motion to Enforce the Order (I) Authorizing Assumption and Assignment of Lease with MOAC Mall Holdings LLC and (II) Granting Related Relief* [Docket No. 10194], expressly reserving, and without waiving, all rights and objections with respect to personal jurisdiction and subject matter jurisdiction. This Notice of Appearance and any subsequent appearance or pleading is not intended nor shall be deemed to waive any of MOAC's substantive or procedural rights, including: (i) the right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn by the United States District Court for this district in any matter subject to mandatory or discretionary withdrawal or the right to seek abstention in favor of any state court; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which MOAC is or may be entitled to under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. Nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

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Dated: February 22, 2022
New York, New York

MOAC MALL HOLDINGS LLC

/s/ Gregg M. Galardi

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